

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STRUCTURED ASSET SALES, LLC,

Plaintiff,

v.

EDWARD CHRISTOPHER SHEERAN,
p/k/a ED SHEERAN, SONY/ATV MUSIC
PUBLISHING, LLC, ATLANTIC
RECORDING CORPORATION *d/b/a*
ATLANTIC RECORDS, BDI MUSIC LTD.,
BUCK MUSIC GROUP LTD., THE
ROYALTY NETWORK, INC., DAVID
PLATZ MUSIC (USA) INC., AMY
WADGE, JAKE GOSLING and DOES 1
THROUGH 10,

Defendants.

Case No. 1:18-cv-5839 (LLS)

**DECLARATION OF STUART CAMP
IN OPPOSITION TO PLAINTIFF'S
MOTION TO COMPEL DISCOVERY**

I, **STUART CAMP**, declare under penalty of perjury as follows:

1. I am a United Kingdom citizen and resident. Since 2010, I, or companies I have owned or with which I have been affiliated or to whom I have provided services, have continuously provided personal management to defendant Edward Christopher Sheeran ("Sheeran"). I manage, supervise and oversee all aspects of Sheeran's professional activities, including, without limitation, his touring, writing and recording activities. If called and sworn as a witness in this matter, I could and would testify competently with respect to the facts set forth in this Declaration based on my personal knowledge and/or my review of my business records kept in the ordinary course of business.

2. Undefined capitalized terms have the meanings given to them in the Third Amended Complaint ("TAC"), which I have read and with which I am familiar.

3. I respectfully submit this Declaration in opposition to the motion of the Plaintiff,

Structured Asset Sales, LLC (“SAS”), which seeks to compel the defendants in this action (primarily Sheeran, Atlantic Recording Corporation (“Atlantic”) and Sony/ATV Music Publishing LLC (“SATV”) to produce documents that relate to three categories of what I understand are known as “indirect profits.” As I will explain in detail below (and, as is addressed in the accompanying declarations of Donald S. Zakarin, counsel for the defendants, Richard Reimer, Esq. of the American Society of Composers, Authors and Publishers and Jose Gonzalez of Broadcast Music, Inc.), SAS’s motion suffers from several fundamental deficiencies:

- i. The TAC nowhere pleads any facts showing any connection between the “indirect profits” that SAS seeks and the alleged infringement of the song *Let’s Get It On* (“LGO”) by Sheeran’s song *Thinking Out Loud* (“TOL”);
- ii. The undisputed facts establish that Sheeran’s popularity and success preceded the release of TOL and his successful concert tours in the United States are not attributable to the success of a single song, TOL, when many of Sheeran’s recordings, including those released both prior to and after TOL achieved comparable or greater success;
- iii. The chronological facts establish that there were no concert performances by Sheeran in the United States that were proximate in time to the release of TOL as a single recording. Rather, virtually every single concert performance by Sheeran in the United States between 2014 and 2018 was proximate in time to either the release of other singles from the album *X* (or the album itself) or singles from his subsequent album ÷;
- iv. Even if one assumes that TOL supposedly infringes LGO as a general matter, Sheeran’s performances of TOL at any and all of his concert performances in the United States were not infringing because the public performances of both TOL and LGO (and every other song performed by Sheeran in the repertoires of both ASCAP and BMI) had been licensed on a blanket basis by ASCAP and BMI; and,
- v. Sheeran’s concert dates in the United States in support of his album *X* took place from August through September of 2014 (with one date in December 2014) and resumed on May 2, 2015 and ran through September 2015. SAS filed this action on June 28, 2018. As noted in the accompanying Zakarin Declaration, SAS’s claims with respect to every single concert date in 2014 is barred by the statute of limitations as are every single concert date between May 2, 2015 and June 27, 2015.

I. The Rank Speculation In SAS’s Memorandum Of Law That *Thinking Out Loud* Directly Caused US Consumers to Purchase Sheeran Concert Tickets Is Objectively Unfounded

4. At the outset, as set forth in both the accompanying Zakarin Declaration and in the accompanying Memorandum of Law, in its motion, SAS points to specific paragraphs of the TAC, which it apparently contends show some supposed linkage between the popular success of TOL and all manner of professional and financial benefits supposedly reaped by Sheeran beyond the income that he has earned from TOL itself. In particular, SAS points to Paragraphs 29, 62, 11, 17 and 70 of the TAC.

5. However, as the Zakarin Declaration points out, none of these paragraphs identifies any factual connection between TOL (and in particular, the allegedly infringing elements in TOL) with any of the supposed professional and financial benefits obtained by Sheeran beyond the publishing and recording income he has earned from TOL. In fact, SAS’s conclusory thesis – for which it offers no specific factual allegations in support – that TOL was the “lead single” from Sheeran’s 2014 album *X* and that Sheeran’s stature as a recording artist was singularly attributable to TOL is utterly untrue.

A. Sheeran’s Career Beginnings and International Success upon the Release of +

6. Sheeran has been writing and recording original music since he was a teenager. In fact, Sheeran achieved worldwide success at a very young age. Even now, after the release of four enormously successful albums for Warner Music UK Limited (“Warner UK”) over the course of eight years, Sheeran is only 28 years of age.

7. Prior to signing a recording contract with Warner UK in January 2011, Sheeran self-released one full-length album (*i.e.*, an LP) and four extended-play albums (*i.e.*, EPs). The final EP, *No. 5 Collaborations Project*, achieved success in the United Kingdom, peaking at

Number 46 on the UK Albums Chart.

8. In June 2011, Sheeran released the first single, *The A-Team*, from his forthcoming full-length album, + (pronounced “plus”), which album represented the first album that Sheeran recorded and released under his recording contract with Warner UK. I would note that it is common in the music industry to release what the artist and the label expect to be the “lead” single from a forthcoming album in advance of the release of the album in order to generate interest and momentum for the later release of the full album.

9. *The A-Team* achieved success on the *Billboard* Hot 100 single charts in the United States, debuting at Number 95 and ultimately peaking at Number 16. Subsequently, *The A-Team* received a nomination for Song of the Year at the 2013 Grammy Awards.

10. In June 2012, Sheeran released the album + in the United States, which also achieved tremendous success in the United States, peaking at Number 5 on the *Billboard* 200 Charts on June 30, 2012.

11. In support of his album +, Sheeran extensively toured the United States, headlining around three-dozen shows. In addition to the shows at which Sheeran headlined, he also extensively toured the United States with the band *Snow Patrol* and then with Taylor Swift.

12. In October 2013 – before *X* was released and before TOL was even written – Sheeran headlined three successive sold-out concerts at Madison Square Garden.

13. As a consequence of +’s success, Sheeran received a nomination for Best New Artist at the 2014 Grammy Awards.

B. Sheeran Achieves Continued Success upon the Release of X

14. On April 7, 2014, in advance of the release of his second full-length album *X* (pronounced “multiply”), Sheeran released the first single from that album titled *Sing*. Again, in

keeping with music industry practice, the first single to be released from an album is what the label and artist anticipate will be the “lead” single, which will generate interest and momentum for the later release of the album. *Sing* debuted at Number 15 in the United States on the *Billboard* Hot 100 Charts, ultimately peaking at Number 13 on June 7, 2014. By the end of July 2014, *Sing* had achieved one million sales in the United States (and a huge number of streams).

15. On June 23, 2014, following upon the success of *Sing*, Sheeran released the album *X*, his second full-length album under his recording contract with Warner UK.

16. *X* achieved widespread success in the United States, debuting at Number 1 on the *Billboard* 200 Charts on July 12, 2014, having sold approximately 210,000 copies during its first week of sales. I want to emphasize that *X* achieved this Number 1 position long before TOL was released as a single recording (as discussed below, TOL was actually the third single released from the album).

17. On August 24, 2014, Sheeran released the second single from *X*, titled *Don't*. While *Sing* reached Number 15 on the charts in the United States, *Don't*, in the wake of the incredible success of *X*, reached Number 9 on the *Billboard* Hot 100 Charts, Number 3 on the *Billboard* Adult Top 40 charts and Number 2 on the *Billboard* Mainstream Top 40 Charts.

18. On September 24, 2014, following the momentum generated by *X*, *Sing* and *Don't*, Sheeran released TOL, the third single from *X*.

19. Like the two singles from *X* released before it and like the success already achieved by *X* itself, TOL too was successful in the United States, ultimately peaking at Number 2 on the *Billboard* Hot 100 Charts on January 31, 2015.

20. Subsequent to the release of TOL as a single recording, Sheeran released two additional singles from *X*, *Bloodstream* on February 11, 2015 and *Photograph* on May 11, 2015.

Bloodstream received a Gold certification from the RIAA in the United States, and *Photograph* received 4x Platinum certification from the RIAA in the United States. *Photograph* also peaked at Number 10 on the *Billboard* Hot 100 Charts on September 26, 2015.

21. As he had in support of his album +, Sheeran performed a concert tour in the United States (and elsewhere) performing at some 60 shows across the United States (and many more than that number outside the United States). In fact, the first eighteen concerts on Sheeran's United States tour were between August 21, 2014 and September 20, 2014, all before TOL was released as a single (but after the release and success of X, *Sing* and, most dates, after the release of *Don't*). There was one further date on December 4, 2014, the only United States concert date in 2014 after the release of TOL as a single.¹

22. Sheeran resumed touring the United States on May 2, 2015 – more than six months after TOL's release – a tour which ended in Central Park, New York (at the Global Citizen Festival, which is a charity show) on September 26, 2015. Almost all of these tour dates followed in close proximity to the release of the single *Photograph* on May 11, 2015.²

23. In short, while SAS has not pleaded any facts showing any linkage between TOL and the sale of tickets to any of Sheeran's concert dates, the above described chronology of facts refutes the unsupported thesis of SAS's motion. Every one of the concert dates (save one) occurred either before the release of TOL as a single or long after its release. If one assumes, as SAS does, that Sheeran fans buy concert tickets to see him perform one particular song – and that assumption

¹ As discussed in Paragraph 35 below, Exhibit 1 hereto lists all of Ed Sheeran's United States concert dates from 2014 through 2018.

² As addressed in the Zakarin Declaration, every one of the 2014 concert dates occurred more than three (3) years prior to the commencement of this action on June 28, 2018. All of the concert dates between May 2, 2015 and June 27, 2015 also occurred more than three (3) years prior to the commencement of this action. Accordingly, in addition to all of the other infirmities of SAS's claim for "indirect profits," any claim relating to these concert dates are time barred.

is contrary to everything I know about the music business and why fans pay to see an artist perform live, instead of simply listening to a song on their phone or at home – the concerts were in proximity not to TOL, but to the release of other successful single recordings.

C. Sheeran Achieves “Record-Breaking” Success upon the Release of ÷

24. On January 6, 2017, nearly two and one-half years after the release of TOL (and X), in advance of the release of his third full-length album titled ÷ (pronounced “divide”), Sheeran released two singles from ÷, titled *Shape of You* and *Castle on the Hill*.

25. On January 17, 2017, *Shape of You* debuted at Number 1 on the *Billboard* Hot 100 Charts, and *Castle on the Hill* debuted at Number 6. *Billboard* subsequently reported that this marked the first time a single recording artist had two songs in the US Top 10 at the same time.

26. *Shape of You* has since become Sheeran’s most successful selling song, and *Billboard* has identified *Shape of You* as the ninth most successful song of all time in the United States. As of September 22, 2017 – around nine months after its release as a single – *Shape of You* became the most-streamed track in the history of *Spotify*, achieving more than 1.3 billion streams on *Spotify* alone.

27. On March 3, 2017, Sheeran released the album ÷.

28. With the momentum provided by the enormous success of *Shape Of You* and *Castle On The Hill*, ÷ debuted at Number 1 on the *Billboard* 200 charts (as had X), having sold approximately 451,000 copies during its first week of sales (more than twice the sales of X in its first week of sales).

29. In addition to the first two singles released from ÷, *Shape of You* and *Castle on the Hill*, Sheeran also released a third single from ÷, *Perfect*, which also reached Number 1 on the *Billboard* Hot 100 Charts.

30. Commencing on June 29, 2017 (almost two years after completing his *X* tour of the United States in September 2015) and running through October 7, 2017 and then again from August 18, 2018 through November 9, 2018, Sheeran extensively toured the United States in support of his album \div , performing more than 70 shows across the United States.

31. As SAS has noted in its motion papers, the Divide Tour, with the momentum provided by the success of the \div album and three immensely popular singles from that album, achieved “record-breaking” success during its nearly two year run. Unmentioned by SAS, however, is that while there were some 70 shows in the United States, most of Sheeran’s performances – some 185 shows – were outside the United States and most of the income generated by the tour was also from outside the United States. SAS also simply assumes that the success of the Divide Tour was somehow attributable to TOL, despite the fact that TOL had been released nearly three years before the Divide Tour and despite the fact that the \div album and the three singles from the album, all released in close proximity to the Divide Tour, were hugely successful.

D. Sheeran Releases A Third Album Debuting At Number 1 on Billboard Charts

32. On July 12, 2019, Sheeran released the album *No. 6 Collaborations Project*.

33. Like *X* and \div before it, *No. 6 Collaborations Project* debuted at Number 1 on the *Billboard* 200 charts.

34. To date, Sheeran has released eight singles from this album, with all but one making the *Billboard* Hot 100 Charts.

II. Sheeran’s Concert Performances of *Thinking Out Loud* Were Licensed

35. Annexed hereto as **Exhibit 1** is a true and correct schedule of concerts that Sheeran performed in the United States between 2014 and 2019, all of which occurred after the release of the album *X* (and, with respect to the 2014 concert dates, all of which, with the exception of one

date in December 2014, occurred before the release of TOL as a single). Again, the 2014 concert dates and those in 2015 before June 27, 2015 all occurred more than three years before SAS commenced this action.

36. As set forth in the Zakarin Declaration, while SAS has asserted a claim for what I understand is called “indirect profits” earned from the alleged infringing United States concert performances by Sheeran of TOL (and from a host of other even more remote activities), in fact, every one of Sheeran’s concert performances were fully licensed by both ASCAP and BMI. This is confirmed by the accompanying Declarations of ASCAP and BMI.

37. Simply put, whether at any or all of his concerts in the United States, Sheeran performed TOL or performed LGO, the song that TOL allegedly infringes, Sheeran’s performance of TOL did not infringe and could not have infringed the public performance rights in LGO because the public performance of both songs were fully licensed by both ASCAP and BMI.

III. Sheeran Never Sold *Thinking Out Loud* Merchandise

38. While I understand SAS’s motion to be seeking three categories of information relating to “indirect profits” with a supposed connection to the alleged infringement of LGO by TOL – profits from Sheeran’s concerts (which, as shown above, were not infringing), merchandise supposedly sold by Sheeran and sponsorships obtained by Sheeran – the TAC actually goes way beyond these three categories in seeking monies supposedly indirectly linked to the alleged infringement. The Zakarin Declaration addresses these other categories (which SAS’s motion carefully avoids mentioning).

39. For purposes of addressing the two remaining categories of “indirect profits” that are addressed by SAS’s motion, however, there is no TOL branded merchandise and there is no linkage between TOL and any “official” merchandise that has ever been sold at any Sheeran

concert. Instead, ignoring the lack of any identified connection between the alleged infringement and income supposedly earned by Sheeran, just like with virtually all other categories of “indirect profits” sought in the TAC, SAS simply seems to assume its conclusion that TOL is uniquely responsible for every single penny of income Sheeran has made in virtually every human endeavor, regardless of how unrelated to the alleged infringement it may be. Not only is that assumed conclusion not pleaded in the TAC, but the facts, as shown above, are actually completely to the contrary.

40. As discussed in detail in the accompanying Zakarin Declaration, without having pleaded any connection between the alleged infringement of LGO by TOL and all manner of “indirect profits” (instead simply assuming the conclusion that TOL is somehow responsible for all of the professional and financial success in Sheeran’s life), SAS seeks to impose an onerous and disproportionate discovery burden on Sheeran. While the gross revenues generated by the concert dates may be relatively obtainable, as Mr. Zakarin explains, all of the information relating to the relevant expense deductions (the promoters’ share; ticket sellers’ payments; advertising and promotional costs; the costs incurred by Sheeran on tour; federal, state and local taxes paid by or on behalf of Sheeran) as well as information relating to the apportionment of allegedly infringing and non-infringing elements (and, again, because all of Sheeran’s performances were fully licensed, there could not have been any infringing performances to begin with) creates an enormous discovery burden.

IV. Endorsements

41. In all of the years I have represented Ed Sheeran, he has only had two relatively short-lived endorsements. The first endorsement was done before X was released (meaning, before TOL was released and more than three (3) years before this action was commenced). Sheeran did

an advertisement for “Beats Headphones” and the song *Don’t* was synched to the advertisement. In other words, it had nothing to do with TOL.

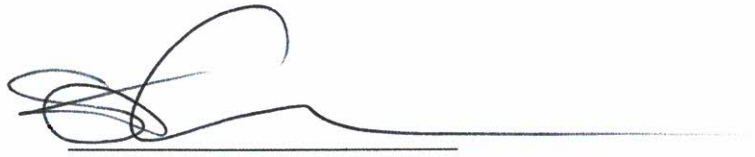
42. The second endorsement was done in May of this year for Heinz Ketchup. Not only did TOL have nothing to do with it, there was no Sheeran music involved at all. That endorsement was brief and has since expired.

43. That is the sum total of Ed Sheeran’s “endorsements,” neither of which have anything to do with TOL.

44. Accordingly, for all of the foregoing reasons, I respectfully submit that SAS’s motion should be denied.

I DECLARE UNDER PENALTY OF PERJURY OF THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

Dated: London, England
November 11, 2019



STUART CAMP

EXHIBIT 1

Date	Venue	Location	Notes
21-Aug	WaMu Theater	Seattle, WA	
26-Aug	SAP Center	San Jose, CA	
27-Aug	Staples Center	Los Angeles, CA	
29-Aug	The Chelsea	Las Vegas, NV	
30-Aug	The Chelsea	Las Vegas, NV	
31-Aug	Jobing.Com Arena	Glendale, AZ	
2-Sep	Sprint Center	Kansas City, MO	
4-Sep	Wolstein Center	Cleveland, OH	
6-Sep	Merriweather Post Pavillion	Columbia, MD	
8-Sep	Wells Fargo Center	Philadelphia, PA	
9-Sep	Xfinity Center	Mansfield, MA	
11-Sep	Time Warner Cable Arena	Charlotte, NC	
12-Sep	Arena at Gwinnett Center	Duluth, GA	
13-Sep	Bridgestone Arena	Nashville, TN	
15-Sep	Target Center	Minneapolis, MN	
16-Sep	Allstate Arena	Rosemont, IL	
17-Sep	The Palace of Auburn Hills	Auburn Hills, MI	
20-Sep	MGM Grand Garden Arena	Las Vegas, NV	Part of the iHeart Radio Festival
4-Dec	The Masonic	San Francisco, CA	Alice in Winterland Holiday Concert

Date	Venue	Location	Notes
2-May	Fair Grounds Race Course	New Orleans, LA	Part of New Orleans Jazz & Heritage Festival
3-May	Tom Lee Park	Memphis, TN	Part of Beale Street Music Festival
6-May	Frank Erwin Center	Austin, TX	
7-May	Verizon Theatre	Grand Prairie, TX	
9-May	BOK Center	Tulsa, OK	
10-May	Scottrade Center	St. Louis, MO	
12-May	Consol Energy Center	Pittsburgh, PA	
13-May	Times Union Center	Albany, NY	
15-May	Las Vegas Festival Grounds	Las Vegas, NV	Rock In Rio Festival
19-May	EnergySolutions Arena	Salt Lake City, UT	
23-May	Mohegan Sun Arena	Uncasville, CT	
24-May	Darling's Waterfront Pavilion	Bangor, ME	
26-May	The Mann Center	Philadelphia, PA	
28-May	Forest Hills Stadium	Queens, NY	
29-May	Forest Hills Stadium	Queens, NY	
30-May	Prudential Center	Newark, NJ	
31-May	Barclays Center	Brooklyn, NY	
7-Jun	CMAC	Hopewell, NY	
9-Jun	Wells Fargo Arena	Des Moines, IA	
10-Jun	Denny Sanford Premier Center	Sioux Falls, SD	
20-Jun	Moda Center	Portland, OR	
23-Jun	Valley View Casino Center	San Diego, CA	
24-Jun	Hollywood Bowl	Los Angeles, CA	
25-Jun	Hollywood Bowl	Los Angeles, CA	
27-Jun	Arrowhead Stadium	Kansas City, MO	Supporting The Rolling Stones
29-Jun	Red Rocks Ampitheatre	Morrison, CO	
30-Jun	Red Rocks Ampitheatre	Morrison, CO	
2-Jul	Klipsch Music Center	Noblesville, IN	
3-Jul	Marcus Ampitheater	Milwaukee, WI	Part of Summerfest Festival
3-Sep	BBVA Compass Stadium	Houston, TX	
5-Sep	Toyota Stadium	Frisco, TX	
8-Sep	Amway Center	Orlando, FL	
9-Sep	American Airlines Arena	Miami, FL	
10-Sep	Amalie Arena	Tampa, FL	
12-Sep	Philips Arena	Atlanta, GA	
13-Sep	Bridgestone Arena	Nashville, TN	
15-Sep	Xcel Energy Center	Saint Paul, MN	
16-Sep	Hollywood Casino Ampitheatre	Tinley Park, IL	
17-Sep	Riverbend Music Center	Cincinnati, OH	
18-Sep	Blossom Music Center	Cuyahoga Falls, OH	
22-Sep	Verizon Center	Washington, D.C.	
23-Sep	Verizon Center	Washington, D.C.	
25-Sep	Gillette Stadium	Foxborough, MA	
26-Sep	Central Park	New York, NY	Part of Global Citizen Festival (Charity Show)

Date	Venue	Location	Notes
29-Jun	Sprint Center	Kansas City, MO	
30-Jun	Wells Fargo Arena	Des Moines, IA	
1-Jul	Xcel Energy Center	Saint Paul, MN	
9-Jul	KeyBank Center	Buffalo, NY	
11-Jul	Wells Fargo Center	Philadelphia, PA	
12-Jul	Wells Fargo Center	Philadelphia, PA	
14-Jul	Mohegan Sun Arena	Uncasville, CT	
15-Jul	Mohegan Sun Arena	Uncasville, CT	
29-Jul	Tacoma Dome	Tacoma, WA	
30-Jul	Moda Center	Portland, OR	
1-Aug	Golden 1 Center	Sacramento, CA	
2-Aug	Oracle Arena	Oakland, CA	
4-Aug	T-Mobile Arena	Las Vegas, NV	
5-Aug	Gila River Arena	Glendale, AZ	
6-Aug	Valley View Casino Center	San Diego, CA	
10-Aug	Staples Center	Los Angeles, CA	
11-Aug	Staples Center	Los Angeles, CA	
12-Aug	Staples Center	Los Angeles, CA	
15-Aug	Pepsi Center	Denver, CO	
17-Aug	BOK Center	Tulsa, OK	
18-Aug	American Airlines Center	Dallas, TX	
19-Aug	Toyota Center	Houston, TX	
22-Aug	AT&T Center	San Antonio, TX	
25-Aug	Infinite Energy Arena	Duluth, GA	
26-Aug	Infinite Energy Arena	Duluth, GA	
29-Aug	Amalie Arena	Tampa, FL	
30-Aug	American Airlines Arena	Miami, FL	
31-Aug	Amway Center	Orlando, FL	
2-Sep	PNC Arena	Raleigh, NC	
3-Sep	Spectrum Center	Charlotte, NC	
5-Sep	North Charleston Coliseum	North Charleston, SC	
7-Sep	KFC Yum! Center	Louisville, KY	
8-Sep	Bankers Life Fieldhouse	Indianapolis, IN	
9-Sep	Quicken Loans Arena	Cleveland, OH	
12-Sep	CenturyLink Center Omaha	Omaha, NE	
15-Sep	Allstate Arena	Rosemont, IL	
16-Sep	Allstate Arena	Rosemont, IL	
19-Sep	Capital One Arena	Washington, D.C.	
20-Sep	Capital One Arena	Washington, D.C.	
22-Sep	TD Garden	Boston, MA	
23-Sep	TD Garden	Boston, MA	
26-Sep	PPG Paints Arena	Pittsburgh, PA	
27-Sep	Little Caesars Arena	Detroit, MI	
29-Sep	Barclays Center	Brooklyn, NY	
30-Sep	Barclays Center	Brooklyn, NY	
1-Oct	Barclays Center	Brooklyn, NY	
3-Oct	Nationwide Arena	Columbus, OH	
4-Oct	Nationwide Arena	Columbus, OH	
6-Oct	Bridgestone Arena	Nashville, TN	
7-Oct	Bridgestone Arena	Nashville, TN	

Date	Venue	Location	Notes
18-Aug	Rose Bowl	Pasadena, CA	
21-Aug	AT&T Park	San Francisco, CA	
25-Aug	CenturyLink Field	Seattle, WA	
6-Sep	Busch Stadium	St. Louis, MO	
8-Sep	Ford Field	Detroit, MI	
14-Sep	Gillette Stadium	Foxborough, MA	
15-Sep	Gillette Stadium	Foxborough, MA	
21-Sep	MetLife Stadium	East Rutherford, NJ	
22-Sep	MetLife Stadium	East Rutherford, NJ	
27-Sep	Lincoln Financial Field	Philadelphia, PA	
29-Sep	PNC Park	Pittsburgh, PA	
4-Oct	Soldier Field	Chicago, IL	
6-Oct	Nissan Stadium	Nashville, TN	
13-Oct	Arrowhead Stadium	Kansas City, MO	
17-Oct	Fargodome	Fargo, ND	
20-Oct	U.S. Bank Stadium	Minneapolis, MN	
24-Oct	Miller Park	Milwaukee, WI	
27-Oct	AT&T Stadium	Arlington, TX	
31-Oct	Mercedes-Benz Superdome	New Orleans, LA	
3-Nov	Minute Maid Park	Houston, TX	
7-Nov	Raymond James Stadium	Tampa, FL	
9-Nov	Mercedes-Benz Stadium	Atlanta, GA	